

From: [Brawley, Kimberly \(USANM\)](#)
To: [Ryan Villa](#)
Cc: [Angelica M Hall](#); [Aric Elsenheimer](#); [Cynthia Gilbert](#); [Donald Kochersberger](#); [Hall, Tavo \(USANM\)](#); [Joe Shattuck](#); [Justine Fox-Young](#); [Marshall J. Ray](#); [tmclark](#)
Subject: RE: [EXTERNAL] USA v. Leveille- Proposed jury questionnaire
Date: Thursday, June 22, 2023 7:56:00 AM

Good morning Ryan,

Thank you for sending your proposed jury questionnaire. Our understanding of the Court's order is that all parties need to submit their proposed questionnaires by this Friday, but objections to any proposed questionnaires are due July 7. We do not agree with many of your proposed questions, but for Friday we intend to file something requesting the standard questionnaire and agreeing, if the Court is inclined to adopt portions of your questionnaire, that we would not object to the innocuous questions. Perhaps the good news for you is that we will not be submitting a questionnaire that will require you to draft objections. We will file our specific objections to the certain questions in your proposed questionnaire by July 7, if not sooner.

We were thinking of asking the Court to double the venire (although I confess that I am not exactly sure how many jurors that is), and we do not oppose your request for a 200 person venire. We think the Court may need to pull from the entire district and are not opposed to the Court doing so.

Best,
Kim

From: Ryan Villa [REDACTED]
Sent: Wednesday, June 21, 2023 4:48 PM
To: Brawley, Kimberly (USANM) [REDACTED]
Cc: Angelica M Hall [REDACTED]; Aric Elsenheimer [REDACTED]; Cynthia Gilbert [REDACTED]; Donald Kochersberger [REDACTED]; Hall, Tavo (USANM) [REDACTED]; Joe Shattuck [REDACTED]; Justine Fox-Young [REDACTED]; Marshall J. Ray [REDACTED]; tmclark [REDACTED]
Subject: Re: [EXTERNAL] USA v. Leveille- Proposed jury questionnaire

Hi Kim,

I hope you've had a chance to review this. In addition to a motion for the court to impose this questionnaire, we'll also be requesting a 200 person venire. Let me know what you think of that request.

Thanks,

Ryan J. Villa

The Law Office of Ryan J. Villa
5501 Eagle Rock Ave NE Suite C2

Albuquerque, NM 87113
Office: 505-639-5709
Fax: 505-433-5812
Email: [REDACTED]

On Fri, Jun 16, 2023 at 2:34 PM Ryan Villa [REDACTED] wrote:

Have a great weekend too!

On Fri, Jun 16, 2023 at 2:35 PM Brawley, Kimberly (USANM) [REDACTED]

wrote:

Hi Ryan,

Thank you very much for sending this to us. We have not had a chance to review it yet, but we will soon, and we will be in touch with you about it early next week. I hope each of you has a good weekend in the meantime.

Best,
Kim

From: Ryan Villa [REDACTED]

Sent: Thursday, June 15, 2023 4:09 PM

To: Brawley, Kimberly (USANM) [REDACTED]; Hall, Tavo (USANM)

[REDACTED]
Cc: Angelica M Hall [REDACTED]; Aric Elsenheimer [REDACTED];
Cynthia Gilbert [REDACTED] Donald Kochersberger [REDACTED]

[REDACTED] Joe Shattuck [REDACTED]; Justine Fox-
Young [REDACTED]; Marshall J. Ray [REDACTED]; tmclark

Subject: [EXTERNAL] USA v. Leveille- Proposed jury questionnaire

Kim and Tavo,

Attached is our proposed questionnaire. Ms. Leveille's team may have a few more changes or requests, but I wanted to get this to you now since next Friday is the deadline to file a motion regarding this. I understand that to be a hard deadline because the jury division will need to send these out two months prior to trial, so I don't think we have the luxury of being able to move this deadline.

Thank you,

Ryan J. Villa

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